

EXHIBIT 68-15



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Attorney for Defendants (except Brian and Corrina Colvin)

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on behalf of
all others similarly situated;

Plaintiff,

v.

Stavatti Aerospace. Ltd, a Minnesota corporation;
Stavatti Aerospace Ltd, a Wyoming corporation;
Stavatti Corporation, a Minnesota corporation;
Stavatti Immobiliare. Ltd. A Wyoming
corporation; Stavatti Niagara, Ltd. A New York
corporation; Stavatti Super Fulcrum, Ltd, a
Wyoming corporation; Stavatti Ukraine, a
Ukrainien business entity; Stavatti Heavy
Industries Ltd. a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and wife; Brian
Colvin and Corrina Colvin, husband and wife;
John Simon and Jean Simon husband and wife ;
William Mcewen and Patricia Mcewen, Husband
and wife; Rudy Chacon and Jane Doe Chacon.
Husband and wife; and DOES 1-10, inclusive

Defendants.

Case No. 2:23-CV-00226-DJH

**DEFENDANTS' RESPONSES
TO PLAINTIFF'S FIRST SET
OF REQUESTS FOR
ADMISSIONS. REQUESTS
FOR PRODUCTION, NON-
UNIFORM INTERROGATORIES,
AND UNIFORM
INTERROGATORIES TO
DEFENDANT RUDY CHACON**

**(Assigned to the Honorable
Diane J. Humetewa)**

Defendant Rudy Chacon, by and through legal counsel, hereby responds to
Plaintiff's above referenced discovery document dated December 12, 2024.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that Plaintiff brought you \$1 million in cash to deliver to Stavatti Aerospace
Ltd.

1 ADMIT x

DENY

2 **REQUEST FOR ADMISSION NO. 2:**

3 Admit that Plaintiff counted the \$1 million in front of you.

4 ADMIT x

DENY

5 **REQUEST FOR ADMISSION NO. 3:**

6 Admit that while Plaintiff counted the \$1 million, you were on the phone with
7 Defendant Brian Colvin, President of Stavatti Aerospace Ltd.

8 ADMIT

DENY x

9 **I have come to learn that Brian Colvin was not President of Stavatti Aerospace Ltd. as**
10 **he had represented.**

11 **REQUEST FOR ADMISSION NO. 4:**

12 Admit that you and Defendant Brian Colvin worked together to find investors for
13 Stavatti Aerospace Ltd.

14 ADMIT x

DENY

15 **REQUEST FOR ADMISSION NO. 5:**

16 Admit that you delivered \$900,000.00 of Plaintiff's cash to Stavatti Aerospace Ltd.

17 ADMIT

DENY x

18 **I delivered \$1,000,000 to Brian Colvin who represented himself to be President of**
19 **Stavatti Aerospace Ltd.**

20 **REQUEST FOR ADMISSION NO. 6:**

21 Admit that you kept \$100,000.00 of Plaintiff's cash.

22 ADMIT

DENY x

23 **I delivered \$1,000,000 to Brian Colvin who represented himself to be President of**
24 **Stavatti Aerospace Ltd. I did not receive any funds or commissions from said funds.**

1 None applicable

2 **REQUEST FOR PRODUCTION NO. 2:**

3 Produce any and all documents between you and Defendant Brian Colvin regarding
4 finding investors for Stavatti Aerospace Ltd.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

6 None.

7 **REQUEST FOR PRODUCTION NO. 3:**

8 Produce any and all phone records from February 25, 2022 through February 27, 2022.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

10 I have no phone records for that period.

11 **REQUEST FOR PRODUCTION NO. 4:**

12 Produce any and all communications between you and any other Defendant.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

14 The only communications I had with any of the other Defendants in this lawsuit were
15 with Brian Colvin and I do believe any of that communication was in writing.

16
17 DATED this 13th day of January 2025

18 BY /s/ Terry Dunmire
19 Terrance D. Dunmire

VERIFICATION

STATE OF ARIZONA)
County of Maricopa) SS

Rudy Chacon, being first duly sworn upon his oath deposes and says under penalty of perjury that he is one of the Defendants in the above referenced case; that he has read the forgoing responses to Plaintiff's **FIRST SET OF REQUESTS FOR ADMISSIONS. REQUESTS FOR PRODUCTION. NON-UNIFORM INTERROGATIVES, AND UNIFORM INTERROGATORIES TO DEFENDANT RUDY CHACON** and knows the contents thereof; that the same is true, except as to those allegations made upon information and belief, and as to those he believes them to be true.

Rudy Chacon

Rudy Chacon

CERTIFICATE OF SERVICE Terrance Dunmire hereby certifies that on this 13th day of January 2025, he electronically transmitted the attached document to the following individuals:

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By: /s/ Terry Dunmire

